

## PRIVACY NOTICE

Date: 19-12-23

Iberdrola, S.A. and the companies of the group headed by our controlling shareholder, Iberdrola, S.A. (hereinafter, any of them, “**Iberdrola**”) commit to protect your privacy and to comply with applicable personal data protection laws and regulations, in particular, the General Data Protection Regulation (“**GDPR**”) and the local laws of the territories in which Iberdrola group companies operate. Your personal data will be processed in a lawful, fair and transparent manner; according to explicit and legitimate purposes; and only to the extent it is relevant and necessary in relation to such purposes. In addition, we will keep your personal data accurate, up to date and for no longer than legally permitted.

Iberdrola has implemented technical and organizational measures to protect your personal data from accidental loss and from unauthorized modification, access, use and disclosure. We have established procedures to respond in the event of a security incident that affects your personal data.

If we update this privacy notice, we will notify you through the website in a timely manner.

You should read this notice and any updates thereof to understand the purpose of the processing of your personal details and the circumstances in which this is undertaken by Iberdrola.

### Who is the data controller of your personal data?

The data controller is the Iberdrola Group company organizing the scholarship that you are applying for, as well as Iberdrola, S.A., as the company that centralizes the overall internal administrative management of scholarships for the Iberdrola Group.

Contact details of the Data Controller:

- IBERDROLA, S.A. (Plaza Euskadi 5, 48009 Bilbao, Spain)  
Data Protection Officer: [dpo@iberdrola.com](mailto:dpo@iberdrola.com) or Tomás Redondo 1, 28033 Madrid
- IBERDROLA ESPAÑA S.A.U. (Plaza Euskadi 5, 48009 Bilbao, Spain)  
Data Protection Officer: [dpo@iberdrola.es](mailto:dpo@iberdrola.es) or Tomás Redondo 1, 28033 Madrid
- IBERDROLA SERVICIOS CORPORATIVOS. S.A. de C.V. (Boulevard Manuel Ávila Camacho 24, piso 19, Colonia Lomas de Chapultepec, Mexico City 11000, Mexico)
- SCOTTISH POWER UK, PLC (1 Atlantic Quay, Glasgow G2 8SP, Scotland, United Kingdom)  
Data Protection Officer: [dataprotection\\_corporate@scottishpower.com](mailto:dataprotection_corporate@scottishpower.com) or 320 SAINT VINCENT STREET (SP HQ), GLASGOW, G2 5AD, SCOTLAND, UK
- AVANGRID MANAGEMENT COMPANY (One City Center, 5<sup>th</sup> Floor, Portland Maine, 04101, USA)
- AVANGRID SERVICE COMPANY (One City Center, 5<sup>th</sup> Floor, Portland Maine, 04101, USA)

- NEOENERGIA, S.A. (Praia do Flamengo, 78 - 3o andar, Flamengo/ Rio de Janeiro, CEP: 22210-030) [dpo@neoenergia.com](mailto:dpo@neoenergia.com)

### **Which of your personal data do we collect and process?**

The personal data we can process about you as a scholarship applicant are those included by you in your application and attached documentation, as well as the results of your evaluation as a scholarship candidate.

The personal data we can process about you as a scholarship applicant are the above as well as images taken in the scholarship award ceremony, follow-up information, data collected in the questionnaire provided once you finish your studies, academic results, and information collected from the applicable university.

No personal data are collected unless necessary for the purposes stated above.

### **How do we obtain your personal data?**

You provide us with your personal data in the information you give us in your scholarship application, and, if applicable, during the master's programme for which you are awarded a scholarship.

### **What purposes will we process your data?**

1. As a scholarship applicant, your personal data will be processed for the following purposes:
  - a) To analyse your suitability and be able to carry out a selection process for the possible awarding of the scholarship requested.
2. If you are awarded a scholarship, your personal data will be processed for the following purposes:
  - a) To ensure that the recipient meets the requirements throughout the term of the scholarship.
  - b) To make payments to the recipient of the scholarship.
  - c) Publication of your name and surname and image in corporate and non-corporate online and offline media (e.g. corporate website, intranet and social media profiles), which may be freely consulted by any third party who can view the media in which they are published, in order to publicise who the beneficiaries of the scholarships are and to publicise the scholarships to the general public) Internal reporting activities.

### **What is the legal basis for processing your data?**

The legal basis for the processing of the data in accordance with the purposes indicated in the previous section are the following:

- Purpose 1(a): the implementation of the terms and conditions of the call for proposals by means of the call for proposals.
- Purposes 2 a), b) and c): execution of the contract signed in the scholarship acceptance letter. In the case of the publication of your image in images and videos, this will be legitimised, where applicable, on the consent that you specifically provide by ticking the box provided for this purpose in the scholarship acceptance letter. Said consent entails the assignment to Iberdrola of the rights of exploitation, use, dissemination, distribution, exhibition, public communication, disclosure and reproduction of your image and voice appearing in the photographs and/or videos taken during the enjoyment of the scholarship, free of charge and exclusively, for the use of the technical means currently known and those that may be developed in the future, for the maximum period permitted by intellectual property legislation and without geographical limitation.
- Purposes 1 b) and 2 d), referring to the performance of internal reporting activities, the basis of legitimacy is Iberdrola's legitimate interest in HR matters for the performance of the Statement of Non-Financial Information, internal HR reporting for the purpose of performing analyses or studies in this regard, as well as the adoption of common policies or the internal administrative management of the Iberdrola Group and of each of the companies that comprise it.

Finally, we inform you that when the processing is based on the legitimate interest of any of the Iberdrola group companies subject to data protection legislation that requires it, these companies have carried out the corresponding balancing analysis between the legitimate interest and the rights of the Data Subject, in order to ensure that the necessary guarantees for the adequate protection of your rights have been taken into account. If you wish to know the conclusions of any of the balancing analysis of the legitimate interest, you can request it to the Data Protection Officer at the address mentioned in the section "Who is responsible for the processing of your personal data".

### **How long will we keep your data?**

Personal data processed to comply with the purpose 1 a) will be processed for the duration of the call for applications and until the end of the scholarship award process.

The personal data processed to comply with the purposes 2 a), b) and c) will be processed during the period of enjoyment of the scholarship and until the end of the scholarship studies.

With respect to purposes 1 b) and 2 d), data will be retained for up to three years after the end of the financial year in which each report was produced. In the case of the publication of your image in images and videos, it will be retained until your consent is withdrawn.

At the end of the above periods, Iberdrola may keep the personal data, blocked, for additional periods as permitted or required by applicable law for the attention of possible liabilities arising from the processing and during the period of limitation of the same and of any other related legal action. . Once this period has elapsed, the data will be erased or anonymised, keeping only the data necessary to control access by previous recipients to new scholarship programmes.

### **To whom will your data be communicated?**

Your data will not be communicated to any third party outside Iberdrola.

Your data may also be provided to other Iberdrola Group companies when the country where the master's programme for which the scholarship is awarded is taught is not the country where the Iberdrola Group company awarding the scholarship is established and it is necessary in relation to any of the purposes indicated in the section " what purposes will we process your data?" depending on your case. Such companies of the Iberdrola Group are those listed on the corporate website: [https://www.iberdrola.com/documents/20125/42388/IB\\_Annual\\_Financial\\_Information.pdf](https://www.iberdrola.com/documents/20125/42388/IB_Annual_Financial_Information.pdf)

In this context, in the event that the communication of your personal data occurs to Iberdrola Group companies located outside the European Economic Area, in countries that do not offer an adequate level of protection of personal data equivalent to that established in the European Union, we inform you that such transfers will be made in accordance with applicable data protection laws and our binding corporate rules ("BCR"). Having BCRs in place means that all entities in our group that subscribe to them have to comply with the GDPR and the same internal rules. It also means that you have the same rights regardless of where Iberdrola processes your data. You can download a copy of the Iberdrola Group BCRs <https://www.iberdrola.com/privacy-policy/binding-corporate-rules>

Your data may be accessed by external service providers as IT services or payment services. We have entered into the legally required contracts with said providers which guarantee compliance with their obligations under data protection laws and regulations. In these contracts, when the companies are located in a third country that does not offer an adequate level of protection of personal data equivalent to that established in the European Union, Iberdrola will ensure that it has the appropriate measures in place so that your data is protected in the country and organization of destination in identical or similar terms to those provided for in European and Spanish regulations. You may contact Iberdrola at any time to learn about the specific guarantees that have been implemented for the adequate and appropriate protection of your data.

### **What are your rights?**

You have the right to access your personal data, as well as to request that inaccurate information be corrected or removed, where the information in question is no longer required for the purposes for which it was initially gathered. You also have the right to object to or restrict the processing and portability of the data. In cases where the processing of your data is based on your consent, you may withdraw such consent at any time, though not retroactively.

You may exercise your rights free of charge by emailing [candidatedataprotection@iberdrola.com](mailto:candidatedataprotection@iberdrola.com)

You may submit a complaint before the Spanish Data Protection Agency or the competent supervisory authority.